

# UNITED STATES DISTRICT COURT

for the

United States Courts  
Southern District of Texas  
FILED

*September 29, 2020*

David J. Bradley, Clerk of Court

United States of America

v.

Devon Morris

Case No. **4:20mj1802**

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 28, 2020 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

18 USC 2115

*Offense Description*

Post Office (Breaking into a building, felony)

This criminal complaint is based on these facts:

See attached Affidavit of probable cause

☒ Continued on the attached sheet.



*Complainant's signature*

Jennifer Rounds

*Printed name and title*

Sworn to before me telephonically.

Date: September 29, 2020



*Judge's signature*

City and state: Houston, Texas

Judge Frances Stacy

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jennifer Rounds, being duly sworn, depose and state the following:

1. I am currently employed as a Federal Agent with United States Postal Inspection Service (USPIS). I have been a Federal Agent with USPIS for approximately 4 years. I have been assigned to the Houston, Texas Division since October 2019. During my career with the USPIS, I have participated in several cases regarding crimes such burglaries, robberies and mail theft. Through these investigations, conversations with other law enforcement officers, and my formal training with USPIS at a 12 week residential training academy, I have become familiar with patterns of activity regarding burglary investigations. The following information was obtained by investigators working on this case and at the scene, including myself, and was provided to me by such officers.

2. I am making this Affidavit in support of Criminal Complaint to be presented to the United States District Court for the Southern District of Texas in the matter of United States v. **Devon Morris**, DOB: 12/22/1993.

3. This complaint charges that Mr. Morris, the defendant, with the intent to commit larceny, forcibly broke into a post office which is a felony violation of Title 21 United States Code, Section 2115.

4. I base this information in part on my personal investigation and upon facts provided by witnesses which have proven to be true and correct through independent investigation.

5. On September 27, 2020, Affiant, Jennifer Rounds, received information from USPIS employees regarding the unlawful entry of individuals into Addicks Barker Post Office located at 16830 Barker Springs, Road, Houston, TX, 77084, Southern District of Texas. At approximately

10:10 PM, Postal Police Law Enforcement Officers Juan Martinez and Tito Velasco received notification of several alarm activations within Addicks Barker Post Office.

6. At approximately 21:47, Security cameras footage captured Morris<sup>1</sup> and an unknown individual wearing light pants walking around the exterior area of the post office.

7. At approximately 22:49, Security cameras footage captured Morris opening an internal post office door from the secured employee area and placing a large orange USPS bag in the adjacent customer lobby of the post office. Camera footage shows the unknown individual in light pants take the orange bag from the lobby and exit the post office exterior front entrance.

8. Officers Martinez and Velasco arrived in the parking area of the post office at approximately 11:00 PM. At that time, Officers observed one unknown individual in light pants running on foot from the entrance of the postal building. Officers briefly followed the individual in their law enforcement vehicle before losing sight of the individual and returning to the parking area.

9. Officers observed damage to the internal doors of the post office consistent with a forced entry and contacted Houston Police Department (HPD) and Postal Inspectors. Officers Martinez and Velasco remained on site by the front entrance of the post office.

10. From approximately 12:00 AM to 12:15 AM, on September 28, 2020, after the post office was cleared by HPD, Postal Inspectors arrived on scene. Upon arrival, your affiant observed that the facility's only accessible entry point was an exterior front door entrance and that the post office's interior lobby locked doors had been pried open, allowing access to employee areas. Several interior cabinets had been left open, including one cabinet that

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<sup>1</sup> Postal Inspectors Angela Daniel, Sean Brogan, and Michael Ridley reviewed the security camera footage and recognized Mr. Morris as the same person, who was later discovered hiding in the post office as described in paragraph 12.

contained several PO Box keys. Inspectors also observed several pried open PO Boxes, loose mail in the lobby corresponding to the PO Box addresses, and that the security camera systems located inside the Post Office had been tampered with. Specifically, a password protected free standing camera system that had located on the office window had been placed in a box and a second camera system showing the inside of the post office had been reformatted to delete all video footage prior to September 27, 2020 at 22:37.

11. Inspectors recovered the large orange USPS bag, which was found to be full of mail, outside the front door. Inspectors also recovered a large blue and yellow sack, containing several parcels addressed to multiple addresses, near the interior door that Morris was seen near in camera footage and a tub of miscellaneous mail in a back room of the post office.

12. At approximately 1:45 AM, Morris was located in a hamper located the back room of the employee area of Addicks Barker Post Office by your affiant and Postal Inspectors on scene. Two crowbars, a cell phone, and a wallet containing 10 banking cards in various names and two vehicle titles were recovered from the hamper immediately after. Several USPS issued PO Box keys were recovered from Morris's pants pocket.

13. Morris was interviewed by your affiant and Postal Inspectors Angela Daniel and Sean Brogan. Morris was read aloud his Miranda Warning and said that he understood his rights as they were read to him. Morris further stated that he did wish to speak to Postal Inspectors.

14. Morris stated he had entered the post office earlier that evening to sleep after encountering two of his associates, "T" and "Jerome" in the post office. Morris said the wallet found with him belonged to T and that the phone belonged to Morris. Morris said he had been sleeping the hamper and did not steal mail that evening. Morris did not provide an explanation for the crow bars or the USPS keys in his pocket.

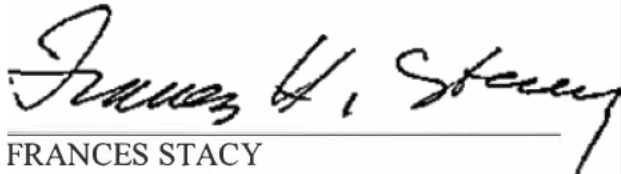
15. Based on the foregoing facts, your affiant believes that probable cause exists for the issuance of a complaint and arrest for Devon Morris charging him the with Burglary of a Post Office in violation of Title 18 United States Code 2115.



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Jennifer Rounds, Investigator  
United States Postal Service

SUBSCRIBED AND SWORN TO before me this 29th day of September, 2020, and I find probable cause.



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FRANCES STACY  
UNITED STATES MAGISTRATE JUDGE